

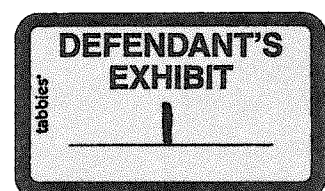
STATE OF INDIANA	)	LAKE COUNTY SUPERIOR/CIRCUIT COURT
	) SS:	
COUNTY OF LAKE	)	CAUSE NO.:
MARC HAGAN,	)	
Plaintiff,	)	
	)	
v.	)	
	)	
EVANS DELIVERY COMPANY, INC. and	)	
ANTHONY DEL NAGRO,	)	
	)	
Defendants.	)	

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### COMPLAINT FOR DAMAGES

Comes now the Plaintiff, by counsel, and for his cause of action against Defendants, alleges and states as follows:

1. At all times relevant herein, the Plaintiff, Marc Hagan was a resident of the State of Michigan.
2. At all times relevant herein, the Defendant, Anthony Del Nagro ("DEL NAGRO"), was a CDL-licensed truck driver operating a commercial motor vehicle owned by Evans Delivery Company, Inc., located at 112 Route 41, Suite 103, Schererville, Indiana ("EVANS").
3. At all times relevant herein, the Defendant, EVANS, was a corporation located and doing business in the State of Indiana.
4. The registered agent for service of process for EVANS is Vandermoere & Macke, 4008 West 79th St., Westover Annex, Indianapolis IN, 46268.
5. At all times relevant herein, DEL NAGRO operated the commercial motor vehicle pursuant to authority conveyed by the United States Department of Transportation, Identification Number 00038111.
6. At all times relevant herein, DEL NAGRO was operating a commercial motor vehicle under the direction and control of EVANS.
7. At all times relevant herein, DEL NAGRO was an employee of EVANS, and was



operating his commercial motor vehicle and otherwise acting with the course and scope of his employment with EVANS.

8. On or about October 29, 2021, the Defendant, DEL NAGRO, was an employee of the Defendant, EVANS, and was operating his commercial motor vehicle and otherwise acting with the course and scope of his employment with EVANS on westbound Interstate 80 near mile marker 1.2 in Lake County, Indiana.

9. At about that same time and place, Plaintiff was also traveling on westbound Interstate 80 near mile marker 1.2 in Lake County, Indiana, operating a vehicle in front of DEL NAGRO.

10. The defendant, DEL NAGRO, negligently operated his commercial motor vehicle and rear-ended Plaintiff's vehicle, causing a collision ("COLLISION").

11. As a result of the COLLISION, Plaintiff received substantial bodily injuries.

12. The responsible cause of the above-referenced COLLISION was the negligence of the Defendants, including, but not limited to, the negligence of DEL NAGRO in the operation of his commercial motor vehicle.

13. Defendant EVANS is vicariously liable for the negligence, if any, of DEL NAGRO

14. That as a direct and proximate result of the negligence of Defendants and the COLLISION described herein, Plaintiff sustained bodily injuries and thereby incurred or can be expected to incur the following damages:

- A. Injuries to his body, some of which may be permanent;
- B. Medical and hospital expenses;
- C. Lost wages and an impairment to his earning capacity; and,
- D. Physical pain and mental anguish.

**WHEREFORE**, the Plaintiff, by counsel, respectfully prays for judgment from the Defendants in an amount reasonably calculated to compensate him for the damages which he has incurred as a result of this collision, the costs of this action, and for all other relief just and proper in the premises.

Respectfully submitted,

**DOEHRMAN•BUBA•RING**

/s/ Daniel J. Buba

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